

**UNITED STATES BANKRUPTCY COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS**

IN RE:

Ivonete A. Araujo

Debtor,

Case No. 21-11721

Chapter 13

Judge Janet S. Baer

**NOTICE OF DEFAULT**

Secured Creditor NewRez LLC d/b/a Shellpoint Mortgage Servicing as servicer for MCLP Asset Company, Inc. ("Creditor") submits the following Notice of Default:

1. Debtor, Ivonete A. Araujo, has not complied with the terms of the Agreed Order Conditioning the Stay entered by this Court on February 3, 2022 (docket #32) (the "Order").
2. Pursuant to the Order, the Debtor was to remain current in mortgage payments with respect to the real property located at 970 Valley View Drive, Downers Grove, IL 60516.
3. As of May 1, 2025, the Debtor is due for December 1, 2022 through April 1, 2025 Mortgage payments for a total default of \$56,210.57. In addition, the Debtor will be responsible for May 1, 2025 payment for a full cure.
4. Debtor is therefore in default of the obligations set forth under the terms of the Order.
5. The Debtor shall have fourteen (14) days from the date of the filing of this Notice to cure the default as stated above while continuing to make all future monthly payments when due. Should the Debtor fail to cure the default within the time allotted, or fail to make the regularly scheduled payments, a Notice of Termination will be filed with the court attesting that the default has not been

cured and the automatic stay imposed shall be lifted without further notice or hearing as to the real property located at 970 Valley View Drive, Downers Grove, IL 60516.

Respectfully submitted,

Dated: May 12, 2025

/s/ Marc G. Wagman  
Potestivo & Associates, P.C.  
Marc G. Wagman (6282192)  
223 W Jackson Blvd., Suite 610  
Chicago, IL 60606  
Telephone: (312) 263-0003  
Main Fax: (312) 263-0002  
Cook County Firm ID #: 43932  
DuPage County Firm ID #: 223623  
Attorneys for Creditor  
[mwagman@potestivolaw.com](mailto:mwagman@potestivolaw.com)

**UNITED STATES BANKRUPTCY COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS**

IN RE:

Ivonete A. Araujo

Debtor,

Case No. 21-11721

Chapter 13

Judge Janet S. Baer

**AFFIDAVIT OF SERVICE**

I, Rachelle Magolan, state that on the 12<sup>th</sup> day of May, 2025, I served a copy of the Notice of Default and Affidavit of Service of same upon the below listed parties:

Ivonete A. Araujo  
970 Valley View Drive  
Downers Grove, IL 60516

Glenn B Stearns  
801 Warrenville Road Suite 650  
Lisle, IL 60532

Adam Brief  
Office of the U.S. Trustee, Region 11  
219 S Dearborn St  
Room 873  
Chicago, IL 60604

David H. Cutler  
Cutler & Associates, Ltd.  
4131 Main St.  
Skokie, IL 60076

by placing same in a well-sealed envelope, by first class mail, with the proper prepaid postage thereon and depositing same in a United States Mail receptacle in the City of Rochester, State of Michigan to Debtor, and via CM-ECF electronic filing to Debtor's Attorney, the Chapter 13 Trustee, and the Office of the U.S. Trustee.

**/s/ Rachelle Magolan**  
Rachelle Magolan